

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re</b>	x	<b>Chapter 11 Case No.</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:	<b>08-13555 (JMP)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	x	

**JOINDER OF ANGELO, GORDON & CO., L.P., CONTRARIAN CAPITAL  
MANAGEMENT, LLC, GOLDENTREE ASSET MANAGEMENT, LP, HAYMAN  
CAPITAL MANAGEMENT, LP, KNIGHTHEAD CAPITAL MANAGEMENT, LLC,  
MASON CAPITAL MANAGEMENT LLC, MOUNT KELLETT CAPITAL  
MANAGEMENT, AND SERENGETI ASSET MANAGEMENT LP TO OBJECTION OF  
CERTAIN NON-CONSOLIDATION PLAN PROPONENTS TO MOTION OF THE AD  
HOC GROUP OF LEHMAN BROTHERS CREDITORS PURSUANT TO SECTIONS  
105(a) AND 1109(b) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2019  
AND 7026 TO ESTABLISH DISCLOSURE PROCEDURES**

TO THE HONORABLE JAMES M. PECK,  
UNITED STATES BANKRUPTCY JUDGE:

The undersigned Non-Consolidation Plan Proponents and holders of notes issued by Lehman Brothers Treasury Co. B.V. and guaranteed by Lehman Brothers Holdings Inc. (the “Noteholders”), by and through their undersigned counsel, hereby join the Objection of Certain Non-Consolidation Plan Proponents (the “Non-Consolidation Plan Proponents’ Objection”) to the motion filed on May 23, 2011 [Docket No. 17014] (the “Motion”) by the Ad Hoc Group of Lehman Brothers Creditors (the “Ad Hoc Group”) seeking to establish uniform disclosure procedures for creditors in these chapter 11 cases, and respectfully state as follows:

For all of the reasons set forth in the Non-Consolidation Plan Proponents' Objection, and in the many other objections filed by creditors in response to the Motion, the Noteholders oppose the unprecedented relief requested by the Ad Hoc Group. Further, the Noteholders reserve all rights to demonstrate, in response to a properly noticed motion, that they are not subject to the requirements of Rule 2019 in their capacity as Non-Consolidation Plan Proponents or otherwise.

WHEREFORE, based on the foregoing, the Noteholders respectfully request that the Court deny the Motion.

Dated: June 10, 2011  
Los Angeles, California

DEWEY & LEBOEUF LLP  
333 South Grand Avenue, Suite 2600  
Los Angeles, California 90071  
Telephone: (213) 621-6000  
Facsimile: (213) 621-6100  
Bruce Bennett  
bbennett@dl.com  
Monika S. Wiener  
mwiener@dl.com

By: /s/ Bruce Bennett  
Bruce Bennett  
A Member of the Firm

*(Attorneys for certain funds managed by and/or affiliated with:  
Angelo, Gordon & Co., L.P., Contrarian Capital Management, LLC,  
Goldentree Asset Management, LP, Hayman Capital Management,  
LP, Knighthood Capital Management, LLC, Mason Capital  
Management LLC, Mount Kellett Capital Management, and  
Serengeti Asset Management LP)*